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INITED STATES R	ANKRUPTCV COURT	NORTHERN DISTRICT OF	FILLINOIS FASTER	N DIVISION

RE: JOHN A MILLER III	) Case No. 20 B 02850	
	Debtor ) Chapter 13	
	) ) Judge: JACQUELINE 1	Р СОХ

## NOTICE OF MOTION

DAVID M SIEGEL JOHN A MILLER III

via Clerk's ECF noticing procedures

14239 S PAIGE AVE DIXMOOR, IL 60426

Please take notice that on June 15, 2020 at 10:30 am my designee or I will appear before the Honorable Judge JACQUELINE P COX at 219 South Dearborn Courtroom 680, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, Il 60603 or by the methods indicated on May 06, 2020.

/s/ Tom Vaughn

## TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

- 1. On January 31, 2020 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
- 2. That the above-captioned plan has not yet been confirmed.
- 3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend plan - #2.3 - for submit language and prorate schedule I.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

> Respectfully submitted, /s/ Tom Vaughn

TOM VAUGHN **CHAPTER 13 TRUSTEE** 55 E. Monroe Street, Suite 3850 Chicago, IL 60603 (312) 294-5900